

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE:	§	Chapter 11
GOODRICH PETROLEUM	§	
CORPORATE, ET. AL.,	§	Case No. 16-61975
	§	
DEBTORS	§	(Jointly Administered)
	§	
CAROLYN JULIA CLARK, ET AL	§	
	§	
	§	
Plaintiffs,	§	ADVERSARY PROCEEDING
vs.	§	16-3149
	§	
GOODRICH PETROLEUM	§	
COMPANY, LLC <i>et al.</i>,	§	
	§	
Defendants.	§	

DEFENDANT JAMESTOWN RESOURCES, L.L.C.'S INITIAL DISCLOSURES

Jamestown Resources, L.L.C., ("Jamestown" or "Defendant") makes these initial disclosures under Federal Rule of Civil Procedure 26(a)(1):

Rule 26(a)(1)(A)(i): The name and, if known, the address and telephone number of each individual likely to have information—along with the subjects of that information—that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment:

1. Jamestown Resources, L.L.C.
c/o Craig Haynes/Greg Curry
Thompson & Knight LLP
1722 Routh Street, Suite 1500
Dallas, TX 75201
Phone: 214-969-1700

The representatives of Jamestown Resources, L.L.C. should have personal knowledge relating to the circumstances giving rise to the litigation and the factual allegations and causes of action in Plaintiffs' and the Moore Plaintiffs' Complaints. They may also have information regarding (1) transactions and communications that clarify and/or refute the allegations in Plaintiffs' and the Moore Plaintiffs' Complaints; and (2) the affirmative defenses asserted in Jamestown's Answer.

2. Brian Shannon
c/o Craig Haynes/Greg Curry
Thompson & Knight LLP
1722 Routh Street, Suite 1500
Dallas, TX 75201
Phone: 214-969-1700

Mr. Shannon has knowledge of Jamestown's small fractional working interest in the oil and gas leases at issue and the marketing and royalty arrangement Jamestown has with Chesapeake.

3. Aldes Harrand Cadwallader
Carolyn Julia Clark
Christopher Stuart Clerk
Katherine Horlen
Michelle Clark Cadwallader
c/o Albert M. Gutierrez
Person Whitworth Borchers Morales LLP
744 Broadway, Suite 100
San Antonio, TX 78209
(210) 824-4411

Patrick Burns Clark
Richard Burns Clark
c/o James L. Drought
Drought Drought & Bobbitt, L.L.P.
112 East Pecan Street, Suite 2900
San Antonio, TX 78205
(210) 225-4031

These individuals are Plaintiffs and Realigned Plaintiffs who may have knowledge regarding the facts alleged in the Plaintiffs' live pleadings.

4. Cayce Moore, Jr.
Cayce Wellborn Moore, III
Jennifer Mansker
Preston Moore
c/o James L. Drought
Drought Drought & Bobbitt, L.L.P.
112 East Pecan Street, Suite 2900
San Antonio, TX 78205
(210) 225-4031

These individuals are the Moore Plaintiffs who may have knowledge regarding the facts alleged in the Moore Plaintiffs' live pleadings.

5. USG Properties Eagle Ford IV, LLC
c/o Deirdre Carey Brown
Hoover Slovaceck, LLP
Galleria Tower II
5051 Westheimer, Suite 1200
Houston, TX 77056
(713) 977-8686
6. EP Energy E&P Company
c/o Philip G. Eisenberg
600 Travis, Suite 3400
Houston, TX 77002
(713) 226-1304
7. Carrizo Eagle Ford, LLC
c/o M. Kristin Gerety
BakerHostetler LLP
811 Main Street, Suite 1100
Houston, TX 77002
(713) 646-1317
8. Chesapeake Exploration, L.L.C.
c/o Craig Haynes/Greg W. Curry
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1722 Routh Street, Suite 1700
Dallas, TX 75201
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9. OOGC America, LLC
c/o Helen Hemingway McLaughlin
Dick Watt
Watt Thompson Frank & Carver LLP
1800 Pennzoil Place – South Tower
711 Louisiana Street
Houston, TX 77002 (713) 650-8100
10. Blackbrush Oil & Gas, L.P.
c/o John Michael Quinlan
McElroy Sullivan, et al
1201 Spyglass, Suite 200
Austin, TX 78746
(512) 326-7111
11. Eagleford Gas 5, LLC

c/o James Hunter Nye
William Ray Whitman
Baker & Hostetler
811 Main Street, Suite 1100
Houston, TX (713) 646-1376

These individuals may have knowledge regarding the respective defendant's involvement in this case.

Rule 26(a)(1)(A)(ii): A copy—or a description by category and location—of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment:

1. Plaintiffs' and the Moore Plaintiffs' leases, made the subject of the lawsuit, as well as associated Memorandum of Leases and Cross Assignment;
2. Documents reflecting Jamestown's receipt of revenues attributable to its fractional working interest in the leases at issue;
3. Correspondence related to the matters in dispute, if any;
4. Any applicable unit agreement, operating agreement, unit operating agreement, and/or marketing and sales agreements pertaining to oil and gas production from the leases at issue;
5. Any document produced by any party during discovery;
6. Any deposition exhibit; and
7. Any document identified by any party in accordance with Federal Rule of Civil Procedure 26(a).

For any documents referenced above that constitute "confidential" documents, those will be produced pursuant to an Agreed Protective Order signed by the Court in this case. Discovery is ongoing in this litigation. Therefore, Jamestown reserves its right to supplement its response in accordance with Federal Rule of Civil Procedure 26(e).

Rule 26(a)(1)(A)(iii): A computation of each category of damages claimed by the disclosing party—who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on

which each computation is based, including materials bearing on the nature and extent of injuries suffered.

Jamestown is not seeking damages at this time.

Rule 26(a)(1)(A)(iv): For inspection and copying as under Rule 34, any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.

Jamestown is unaware of any applicable insurance agreements at this time. Jamestown reserves its right to supplement its response in accordance with Federal Rule of Civil Procedure 26(e).

DATED: January 17, 2018

Respectfully submitted,

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**ATTORNEYS FOR JAMESTOWN
RESOURCES, L.L.C.**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been served on all counsel of record on this the 17th day of January, 2018 via email.

/s/ Rachelle H. Glazer
Rachelle H. Glazer